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November 17, 2003

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VIA HAND DELIVERY

Hon. Ron Jones, Hearing Officer
Tennessee Regulatory Authority
460 James Robertson Parkway
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Re: *Workshop to Gather Information from the Telecommunications Industry
Related to Preventing Violations of Tenn. Code Ann. § 65-21-114*
Docket No. 03-00502

Dear Director Jones:

Enclosed are the original and fourteen copies of BellSouth's *Comments* related to preventing violation of T.C.A. § 65-21-114. BellSouth appreciates the opportunity to comment on this matter.

Very truly yours,

Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Workshop to Gather Information from the Telecommunications Industry
Related to Preventing Violations of Tenn. Code Ann. § 65-21-114*

Docket No. 03-00502

**COMMENTS OF BELL SOUTH TELECOMMUNICATIONS RELATED
TO PREVENTING VIOLATIONS OF T.C.A. § 65-21-114**

Following the November 7, 2003 Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tenn. Code Ann. § 65-21-114 (the "Workshop"), Director Ron Jones provided the participants the opportunity to file written comments. Following are BellSouth Telecommunications, Inc.'s ("BellSouth") comments.

I. Summary of BellSouth Comments

BellSouth complies with Tenn. Code Ann. § 65-21-114(a) as described in its approved General Subscriber Services Tariff Section A3.6.2.1, County-Wide Calling (copy attached). BellSouth submits that the most practical and efficient manner to ensure full industry compliance with § 65-21-114(a) is for all local service providers to provide the necessary information for their customers to the Tax Area Record ("TAR") Code Master File ("Master File").

The industry's ability to comply fully with T.C.A. § 65-21-114(a) requires that county-wide calls that are dialed on a "1+" basis can be properly identified, based on information for both the originating and terminating parties in the Master File. When the terminating party is served by another service provider (independent company, CLEC,

co-operative, etc.), that service provider must provide the necessary information for its customers. Without this information, other carriers have no basis on which to properly identify and bill these calls. While BellSouth does not oppose industry members using methods other than the TAR Code solution, such as mileage bands, unless those companies also participate in the TAR Code process, there will be inevitable gaps in the process, with some customers continuing to be billed for intracounty calls. During the Workshop, helpful comments were provided as to how this participation can be most easily and efficiently accomplished.

As discussed during the Workshop, BellSouth is willing to allow the Authority or another entity to administer the Master File process. Alternatively, BellSouth is willing, for the time being, to continue to administer the process in the manner it currently does, without charge to the other members of the industry. Regardless of what proposal is adopted, however, BellSouth opposes any abandonment of the TAR Code process in favor of mileage bands or other alternatives.

II. Background and the Tax Area Record Code Master File Solution

In most cases, county-wide calls are dialed on a 7-digit local basis. In these instances, these calls are no different than any other local call. In those situations where a county-wide call is dialed as a toll call (i.e., 1 + 10 digits), those calls will be completed as toll calls and billed as such, absent intervention in the billing process. That intervention is exactly what the TAR Code solution does; by using tax area records, it identifies calls originated and terminated in one county and bills them as local. BellSouth uses its TAR Code Master File as an edit function during

the billing process to ensure that customers are not billed for these county-wide calls.¹

When county-wide calling was first ordered by the Tennessee Public Service Commission in the early 1990s, BellSouth and the other telephone companies looked for alternatives to comply with such order. The result was the TAR Code Master File solution. It was the cheapest and most efficient method for handling county-wide calling. BellSouth worked with the Independent Telephone Companies and Cooperative Telephone Companies to ensure that inter-company "1 + " county-wide calls were not billed to the originating caller, and these other companies also use the Master File to ensure proper billing for their customers. Later, the Master File was offered to Interexchange Carriers (IXC) for their use in billing interLATA intra-county calls. After passage of the Federal Telecom Act, BellSouth offered the use of its Master File to Competitive Local Exchange Carriers ("CLECs"). Most CLECs in Tennessee also use this process in order to properly bill county-wide calls. For the TAR Code Master File solution to work, other telephone companies must provide the taxing authority code for their customers into the Master File so that any company can access the database and properly identify county-wide calls during the billing process. This arrangement works well and continues to be the process used by BellSouth and most other companies to properly bill these calls.

In order to keep the Master File current, BellSouth requests that participating companies provide updates to their Master File entries by the 10th and 24th of each month. Once these updates are combined into the Master File, BellSouth will send

¹ In the event that a customer disputes a bill for a county-wide call, BellSouth will investigate and adjust the customer's bill once it is confirmed that call was a county-wide call.

a copy of the Master File to each company. Therefore, each participating company receives two copies of the Master File each month. At the present time, BellSouth maintains the Master File at no charge and does not charge any carrier either to input data into this database or for copies of the database for use in a company's billing process.

BellSouth issued Carrier Notification SN1083660 to all facility-based CLECs and Independent Companies on April 4, 2003 to facilitate the provision of information necessary to ensure toll-free county wide calling in Tennessee. This Carrier Notification included a link to the County-Wide Calling CLEC Pre-Ordering and Ordering Guidelines. Copies of both documents are attached.

III. BellSouth Responses to Specific Questions Raised at the Workshop

Following are responses from BellSouth to specific questions that were raised in comments filed prior to and during the Workshop.

A. As to prepaid service providers, is an intra-county call that terminates outside a local calling area blocked, i.e., is it treated as long distance?

BellSouth treats all calls outside of the local calling area, including county-wide calls, as long distance and routes them to the long distance carrier selected by the customer.

B. Do Local Exchange Companies forward intra-county calls that terminate outside of a local calling area to long distance service providers? To resellers of local service, to resellers of long distance service?

BellSouth routes all calls that terminate outside of the local calling area to the long distance carrier selected by the customer whether that provider is a facility-based carrier or a reseller. Such a call would not be routed to a reseller of local service.

C. Who should have the burden of designating intra-county calls as local?

Any "burden" would appear to ultimately apply to the party with billing responsibility. However, sufficient information must be available to properly classify and bill an intra-county call.

D. Do wholesale providers notify their wholesale customer that they do not filter calls before forwarding call records to the wholesale customer?

BellSouth does not bill resellers of its local service for county-wide calls. With regard to county-wide calling, bills to resellers of BellSouth local service are treated in a similar way to bills to retail customers, in that those county-wide calls identified using the Master File are not included on bills to the reseller.

E. Can the TAR Code Database fully meet the needs of carriers without participation by all carriers?

No; All local service providers who serve customers in areas where county-wide calls may be dialed on a "1+" basis must provide input into the Master File. No input is needed from resellers of BellSouth's local service and/or long distance resellers.

F. The need for uniform and consistent practices for updating the TAR Code Database and disseminating information to subscribers.

BellSouth provides the county-wide calling CLEC Pre-Ordering and Ordering Guidelines on its publicly available web site, and this document contains the "uniform and consistent practices" for updating the Master File and disseminating information to subscribers of that Master File. During the Workshop, no party raised this item as an issue.

G. Stale data as a result of new NPA/NXXs, procedures for submitting and disseminating data, and carriers' inabilities to extract data from previous files.

According to the Guidelines referenced above, BellSouth accepts bi-monthly updates from participating companies. With regard to the perceived inability to extract data from previous files, each carrier is free to archive and use previous files downloaded from the Master File as they wish. Therefore, it is difficult to understand what "inabilities" exist and how that affects a carrier's ability to provide county-wide calling to its customers. During the Workshop, no party raised this item as an issue.

H. Initial development costs resulting from file format changes and purchase of proprietary software.

BellSouth does not understand the reference to "proprietary software". Participation in the Master File does not, from BellSouth's perspective, require the purchase of any "proprietary software". Initial development costs to access and use Master File information is common to all parties, more so to BellSouth who incurs on-going expense to maintain the Master File. During the Workshop, no party raised this item as an issue. Furthermore, several participants commented that they could not recall any format changes made by BellSouth.

I. Difficulties interfacing subscriber internal systems with the TRA Code Database.

Again, any solution would require a company to incur some cost. Of course, companies currently participating in the Master File have already incurred this cost. Each service provider will incur some cost to implement county-wide calling, regardless of the method chosen to provide the service. During the Workshop, no party no party raised this item as an issue.

IV. Conclusion

The industry in Tennessee has successfully used the TAR Code Master File solution for approximately ten years to provide toll free county-wide calling. No party has alleged that the Master File solution does not work. The vast majority of local service providers in Tennessee employ the TAR Code solution. The fifty or so companies participating in the TAR Code solution should not have to incur additional expense to adopt another method of providing county-wide calling simply because a few service providers have elected not to participate in the Master File. While local service providers should be free to choose their own method of providing county-wide calling, the ability of local service providers in general to provide toll-free county-wide calling is adversely affected by the refusal of a few service providers to participate in the TAR Code Master File.

No better alternative method of providing toll-free county-wide calling has been presented. Mileage bands are inexact and generally require the provider to forego toll revenue. Nothing was presented during the Workshop to demonstrate how the "GEO codes" used by some providers would address these issues. Uniform use of the TAR Code Master File solution would resolve the problems and complaints arising from county-wide calling.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line. The signature is stylized with a large, sweeping loop.

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CERTIFICATE OF SERVICE

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☐ Overnight
☐ Electronic

Suzette C. Walker
Touch 1 Communications
100 Brookwood Road
Atmore, AL 36504

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

Lynda Gaston, Regulatory Analyst
Global Tel*Link
2609 Cameron Street
Mobile, AL 36607

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

Robert D. Dudney, General Manager
Twin Lakes Telephone Cooperative Corp.
P. O. Box 67
Gainesboro, TN 38562

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

Anne Lynch, Regulatory Manager
1-800-Reconnex
2500 Industrial Ave.
Hubbard, OR 97032

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

Robert Fulmer
ACCXX Communications, Inc.
4035 Tampa Rd., Suite 6000
Oldsmar, FL 34677

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

Ricky Gibbs
DTC
P. O. Box 247
Alexandria, TN 37012
For DTC and Advantage Cellular Systems, Inc.

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☐ Facsimile
☐ Overnight
☐ Electronic

Bobbie Swager, President
Express Connection Phone Service
3207 Nolensville Road
Nashville, TN 37211

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Robert E. Jones
National Telecom
1205 Lantanna Road
Crossville, TN 38555

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

Mario L. Soto
BellSouth BSE, Inc.
North Terraces Bldg, Suite 350
Atlanta, GA 30346

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

G. M. Patterson, Manager
Highland Communications
950 Main Street, Suite D
Wartburg, TN 37887

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

Christina Tygielski
Universal Access, Inc.
Sears Tower
233 S. Wacker Drive
Chicago, IL 60606

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight
☐ Electronic

Talk America
c/o Connie Wrightman, Consultant
Technologies Management, Inc
210 North Park Ave.
Winter Park, FL 32789

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight
- ☐ Electronic

Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062
For MCImetro Access Transmission, Inc.; Brooks
Fiber of Tennessee, Inc. MCI WorldCom, Inc.,
SouthernNet dba Telecom USA; and TTI National

A handwritten signature in black ink, appearing to read "Jon E. Hastings", is written over a horizontal line.